Case 2:25-cr-00025-FMO Document 53 Filed 01/24/25 Page 1 of 4 Page ID #:155

BY:

FILED

CLERK, U.S. DISTRICT COURT

1/24/25

DEPUTY

V. Figueroa

Acting United States Attorney LINDSEY GREER DOTSON Assistant United States Attorney

JOSEPH T. MCNALLY

1

2

3

4

5

6

7

8

9

10

12

13

14

15

16

18

19

20

21

22

23

24

25

26

27

28

Chief, Criminal Division

DECLAN T. CONROY (Cal. Bar No. 350 7 CENTRAL DISTRICT OF CALIFORNIA DANIEL H. WEINER (Cal. Bar No. 329)25)

Assistant United States Attorneys

International Narcotics, Money Lauhdering,

and Racketeering Section

1400 United States Courthouse 312 North Spring Street

Los Angeles, California 90012 Telephone: (213) 894-2872/0813

Facsimile: (213) 894-6269

declan.conroy@usdoj.gov E-mail: daniel.weiner@usdoj.gov

Attorneys for Plaintiff UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

V.

AARON GOMEZ, 17 aka "Blanco,"

JONATHAN FERNANDO GONZALEZ,

aka "Trigger," ANTHONY GONZALEZ,

aka "Richie," JESSE PERALES, and aka "Cartoon,"

Defendants.

No. CR 2:25-25-FMO

GOVERNMENT'S EX PARTE APPLICATION TO UNSEAL CASE

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California and Assistant United States Attorneys Declan T. Conroy and Daniel H. Weiner, hereby files this ex parte application to unseal the case in the above-captioned case, except for the complaint.

This application is based upon the attached declaration of Daniel H. Weiner and the files and records in this case. Dated: January 24, 2025 Respectfully submitted, JOSEPH T. MCNALLY Acting United States Attorney LINDSEY GREER DOTSON Assistant United States Attorney Chief, Criminal Division /s/ Daniel H. Weiner
DECLAN T. CONROY DANIEL H. WEINER Assistant United States Attorneys Attorneys for Plaintiff UNITED STATES OF AMERICA

DECLARATION OF DANIEL H. WEINER

I, DANIEL H. WEINER, declare as follows:

- 1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am assigned to represent the government in this case. I make this declaration in support of the government's <u>ex parte</u> application to unseal the case and indictment, except for the complaint, in <u>United</u> States v. Gomez, et al., Case No. CR 2:25-25-FMO.
- 2. On December 12, 2024, an under-seal complaint was filed charging defendants with violent crime in aid of racketeering, in violation of §§ 18 U.S.C. 1959(a), 2(a) (alleging attempted murder).

 See United States v. Gomez, et al., Case No. CR 2:24-mj-7371-AGR.
- 3. On December 17, 2024, defendants AARON GOMEZ, JONATHAN FERNANDO GONZALEZ, and ANTHONY GONZALEZ made their initial appearance in this case on the complaint.
- 4. On January 15, 2025, the grand jury returned a sealed indictment charging all defendants with violent crimes in aid of racketeering, in violation of 18 U.S.C. § 1959(a)(2) (maiming) and § 1959(a)(3) (assault resulting in serious bodily injury). Defendant GOMEZ is charged with an additional count of 18 U.S.C. § 1959(a)(5), alleging attempted murder.
- 5. On or around January 20, 2024, defendant JESSE PERALES was arrested by local law enforcement in the Central District of California, and is expected to make his initial appearance on the indictment in this case after the resolution of his pending California state criminal matter and/or the state's acceptance of a writ of habeas corpus ad prosequendum.

6. As all defendants have made their appearance in this district and/or are in custody, the facts and circumstances that initially warranted sealing the indictment and docket in this case are no longer in effect. However, as explained in the government's application to seal the complaint, see United States v. Gomez, et al., Case No. CR 2:24-mj-7371-AGR (sealing app and order), public disclosure of the complaint could lead to serious adverse consequences, including witness safety and intimidation.

Accordingly, the government respectfully requests that the complaint remain sealed, the docket made public, and the indictment be placed on the public docket.¹

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed in Los Angeles, California, on January 24, 2025.

¹ Should the Court deny the government's request to maintain the complaint under seal, the government respectfully requests that the Court provide the government with an opportunity to provide the Court with a redacted version of the complaint to be publicly filed before the entirety of the complaint is unsealed.

/s/ Daniel H. Weiner

Daniel H. Weiner